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180 South Clinton Avenue  
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Michael J. Shortley III  
Senior Corporate Attorney



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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

December 23, 1992

BY OVERNIGHT MAIL

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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Re: CC Docket No. 92-237

Dear Ms. Searcy:

Enclosed for filing please find an original plus nine (9) copies of the Comments of Rochester Telephone Corporation in this proceeding.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed self-addressed envelope.

Very truly yours,

Michael J. Shortley, III

(3165F)

cc: Downtown Copy Center

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Administration of the North  
American Numbering Plan

CC Docket No. 92-237

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COMMENTS OF ROCHESTER  
TELEPHONE CORPORATION

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JOSEPHINE S. TRUBEK  
General Counsel

ROCHESTER TELEPHONE CORPORATION  
180 South Clinton Avenue  
Rochester, New York 14646

Michael J. Shortley, III  
of Counsel

December 23, 1992

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COMMENTS OF ROCHESTER  
TELEPHONE CORPORATION

Rochester Telephone Corporation ("Rochester"), on its behalf and that of its exchange carrier subsidiaries,<sup>1/</sup> submits these comments in response to the Commission's Notice of Inquiry initiating this proceeding.<sup>2/</sup> In the Notice, the

<sup>1/</sup> AuSable Valley Telephone Company, Inc., Breezewood Telephone Company, C, C & S Telco, Inc., Canton Telephone Company, Citizens Telephone Company, Inc., DePue Telephone Company, Enterprise Telephone Company, Fairmount Telephone Company, Inc., Highland Telephone Company, Inland Telephone Company, Lakeshore Telephone Company, Lakeside Telephone Company, Lakewood Telephone Company, Lamar County Telephone Company, Inc., Midland Telephone Company, Mid-South Telephone Company, Inc., Midway Telephone Company, Minot Telephone Company, Mondovi Telephone Company, Monroeville Telephone Company, Inc., Mt. Pulaski Telephone & Electric Company, Ontonagon County Telephone Company, Orion Telephone Exchange Association, Oswayo River Telephone Company, Prairie Telephone Company, S & A Telephone Company, Inc., The Schuyler Telephone Company, Seneca-Gorham Telephone Corporation, Southland Telephone Company, St. Croix Telephone Company, The Statesboro Telephone Company, Sylvan Lake Telephone Company, Inc., The Thorntown Telephone Company, Inc., Urban Telephone Corporation, Viroqua Telephone Company, Vista Telephone Company of Iowa and Vista Telephone Company of Minnesota.

<sup>2/</sup> Administration of the North American Numbering Plan, CC Dkt. 92-237, Notice of Inquiry, 7 FCC Rcd. 6837 (1992) ("Notice").

Commission requests the parties to comment upon two broad issues: (1) whether the Commission should change the administrator of the North American Numbering Plan;<sup>3/</sup> and (2) whether the Commission should expand the carrier identification codes used for Feature Group D access.<sup>4/</sup> Rochester believes that the Commission should permit Bell Communications Research ("Bellcore") to continue to administer the North American Numbering Plan. In addition, because current carrier identification codes are nearly exhausted, the Commission has little choice but to expand carrier identification codes from three to four digits.<sup>5/</sup>

The Commission also seeks comments on two subsidiary issues -- whether it should take any action regarding numbering systems for personal communications services ("PCS") and whether it should investigate local number portability.

First, there is no reason for the Commission to remove Bellcore as the administrator of the North American Numbering Plan. As the Commission recognizes, "the numbering plan has been administered over a long period of time with considerable

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<sup>3/</sup> Id., 7 FCC Rcd. at 6840-41, ¶¶ 22-35.

<sup>4/</sup> Id., 7 FCC Rcd. at 6841, ¶¶ 36-38.

<sup>5/</sup> Id., 7 FCC Rcd. at 6842, ¶¶ 40, 41.

skill and foresight."<sup>6/</sup> The only possible justification for changing the administrator is a potential conflict of interest, because Bellcore's owners and their competitors require numbering resources. However, as Bellcore notes, it administers the North American Numbering Plan in an impartial manner.<sup>7/</sup> Moreover, the complaints that Bellcore does not act impartially are vastly overstated. Although mobile services providers contend that their requests for numbering resources have not been considered fairly,<sup>8/</sup> the fact remains that such carriers have received numbering resources. Moreover, the Commission retains jurisdiction over the administration of the North American Numbering Plan. Thus, to the extent that disputes arise, parties have a forum in which they may raise these concerns. The record provides no basis for changing the administrator of the North American Numbering Plan.

Second, the Commission should not delay the expansion of carrier identification codes from three to four digits. Although the costs associated with this code expansion may be significant, the Commission has little choice but to utilize four digit carrier identification codes. The current three

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<sup>6/</sup> Id., 7 FCC Rcd. at 6840, ¶ 23.

<sup>7/</sup> See id., 7 FCC Rcd. at 6840, ¶ 27.

<sup>8/</sup> See id., 7 FCC Rcd. at 6840, ¶ 26.

digit codes are approaching exhaustion. Thus, carriers are finding it increasingly difficult to obtain carrier identification codes. Ultimately, the lack of availability of carrier identification codes could preclude new entry into the interexchange business. Thus, the Commission has little choice but to permit the expansion of carrier identification codes to four digits.

Third, with respect to the Commission's two subsidiary issues -- PCS numbering and local number portability -- the Commission should take no action at this time. Both domestic and international standards-setting organizations are currently considering PCS numbering issues. Similarly, action on local number portability is premature. 800 number portability will commence in May 1993. The Commission should gain experience with 800 number portability before it considers local number portability.

For the foregoing reasons, the Commission should not change the administrator of the North American Numbering Plan,

should permit the expansion of carrier identification codes from three to four digits and should take no action at this time with respect to PCS numbering systems or local number portability.

Respectfully submitted,

Josephine S. Trubek /LH2  
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General Counsel

ROCHESTER TELEPHONE CORPORATION  
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